

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

HANNAH BOCKER, SARAH BOCKER and )	
BARBARA BOCKER as Administrator of the )	
Estate of GERARD BOCKER and BARBARA )	
BOCKER, Individually )	C.A. NO.:1:21-cv-01174-MN
)	
Plaintiffs,v. )	
)	
HARTZELL ENGINE TECHNOLOGIES LLC )	
)	
)	
CONTINENTAL AEROSPACE )	JURY TRIAL DEMANDED
TECHNOLOGIES, INC. f/k/a CONTINENTAL )	
MOTORS, INC. )	
)	
Defendants. )	
)	

**DEFENDANT HARTZELL ENGINE TECHNOLOGIES LLC'S  
OPPOSITION TO A STAY OF THE PROCEEDINGS.**

Defendant Hartzell Engine Technologies LLC, (“HET”), by and through its undersigned counsel, respectfully opposes a Stay of the Proceedings for the reasons that follow.

Unlike the action pending in the Supreme Court of New York, Dutchess County, all parties agree this Court has jurisdiction over this matter as evidenced by the fact that Plaintiffs filed their Complaint here and no defendant has filed a motion to dismiss on jurisdictional grounds. There are still disputes in New York over jurisdiction. There is no dispute here. Further, both cases are in their infancy. Awaiting any resolution in the Supreme Court of New York, Dutchess County, will only delay the resolution of this action. Any rulings on the jurisdictional motions in New York are subject to an appeal as of right. Any such appeals could result in a delay of years. Any delay is prejudicial to HET as witnesses' memories can fade with the passage of time.

WHEREFORE, HET respectfully requests the Court deny the parties' request for a stay.

**MARGOLIS EDELSTEIN**

/s/ Krista M. Reale

Krista M. Reale, Esq. (DE Id. #4748)

300 Delaware Avenue, Suite 800

Wilmington, DE 19801

(302) 404-4785

[kreale@margolisedelstein.com](mailto:kreale@margolisedelstein.com)

Attorneys for Defendant Hartzell Engine

Technologies LLC

Linda J. Schneider, Esq. (*pro hac vice*)

TRESSLER LLP

233 S. Wacker Dr., 61<sup>st</sup> Floor

Chicago, IL 60606

(312) 627-4202

[lschneider@tresslerllp.com](mailto:lschneider@tresslerllp.com)

Attorneys for Defendant Hartzell Engine

Technologies LLC

**DATED:** January 19, 2022